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MEETRIX IP, LLC  
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13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 SAN FRANCISCO DIVISION

16  
17 BLUE JEANS NETWORK, INC.,  
18 Plaintiff,  
19 v.  
20 MEETRIX IP, LLC,  
21 Defendant.

Case No. Case 3:22-cv-01055-SK

**NOTICE OF PENDENCY OF OTHER  
ACTION OR PROCEEDING**  
**CIVIL L.R. 3-13**

The Hon. Magistrate Judge Sallie Kim

1 Pursuant to Civil L.R. 3-13, defendant Meetrix IP, LLC (“Meetrix”) hereby provides  
 2 notice of a related case pending in the Western District of Texas, *Meetrix IP, LLC v. Verizon*  
 3 *Communications, Inc.*, Case No 21-CV-01289 (the “Texas case”).<sup>1</sup>

4 **I. Introduction**

5 This case is a declaratory judgment action corresponding to a patent infringement lawsuit  
 6 brought in 2021 in the Western District of Texas. The two cases concern the same four patents  
 7 and products. The parties are essentially the same. Indeed, declaratory judgment plaintiff relies  
 8 upon the Texas case as a basis for declaratory judgment jurisdiction in this action. (Dkt. 1,  
 9 Complaint, ¶ 8.) The instant case is merely an attempt by Plaintiff to engage in forum shopping  
 10 and avoid a proper lawsuit in Texas.

11 Coordination of these overlapping lawsuits pursuant to Local Rule 3-13 would clearly  
 12 promote judicial efficiency. Currently, there is a pending motion to dismiss based upon lack of  
 13 personal jurisdiction in the Texas case. Determining the best way of coordinating or consolidating  
 14 these lawsuits will be easier after resolution of that motion. Accordingly, Meetrix requests that  
 15 this case be stayed pending resolution of the motion in the Texas case; thereafter, the Court can  
 16 best determine how to handle this litigation in light of the Texas case.

17 **II. The Texas Case**

18 In the Texas case, Meetrix has alleged infringement of the same four patents that are at  
 19 issue in this case. (Dkt. 1, Complaint, ¶ 8.) Here, the plaintiff seeks a declaration of non-  
 20 infringement of the identical patents. (*Id.*, ¶ 1.) Meetrix is a party in both cases. The plaintiff in  
 21 this case, Blue Jeans Network, Inc. (“Blue Jeans”), is a wholly-owned subsidiary of the defendant  
 22 in the Texas case, Verizon Communications, Inc. (“Verizon”). (Dkt. 1, ¶ 3; Dkt. 2, Cert. of  
 23 Interested Entities, at 1.)

24 The relevant web-conferencing product in both lawsuits is marketed by Verizon and  
 25 BlueJeans as “BlueJeans by Verizon.” *See* [https://www.bluejeans.com/blog/bluejeans-a-verizon-](https://www.bluejeans.com/blog/bluejeans-a-verizon-company)  
 26 company. The parties are currently engaged in jurisdictional discovery, and the jurisdictional

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 28 <sup>1</sup> A Copy of the Complaint in the Texas Case is attached to the Decl. of Andrew DiNovo  
 (“DiNovo Decl.”) as Exhibit 1.  
 2917.000/1727194.3

1 issue has not been fully briefed and thus is not ripe for determination. If allowed to go forward,  
 2 the Texas case will be the first-filed case and this case will be redundant and a waste of judicial  
 3 resources.

4 **III. A Stay of This Case Would Promote Efficient Determination of the Action**

5 **A. The Pending Motion in the Texas Case.**

6 Verizon has moved to dismiss the Texas case for lack of personal jurisdiction. It argues  
 7 that it is a mere holding company, while acknowledging Verizon's many business operations in  
 8 the state of Texas. The parties are actively engaged in discovery. To the extent some form of  
 9 misnomer relating to the named parties needs be addressed, it can be done in the Texas case.

10 As referenced above, while Verizon claims in the Texas case that it has no relationship to  
 11 the accused product, it is typically referenced as "BlueJeans by Verizon," including on  
 12 Verizon.com. [https://www.verizon.com/business/products/voice-](https://www.verizon.com/business/products/voice-collaboration/conferencing/bluejeans/)  
 13 [collaboration/conferencing/bluejeans/](https://www.verizon.com/business/products/voice-collaboration/conferencing/bluejeans/)

14 **B. A Stay Pending Resolution of the Texas Motion Would Promote Judicial  
 15 Efficiency.**

16 It would be inefficient to have two cases relating to the same patents and same product  
 17 proceeding simultaneously in two different forums. Whether the Texas case is dismissed is  
 18 unquestionably relevant to whether or how the Texas case and this case are coordinated. Counsel  
 19 for Meetrix proposed a stipulated stay in this case until the jurisdictional determination in the  
 20 Texas case was made; counsel for Verizon/BlueJeans declined. (DiNovo Decl., ¶ 2.) Meetrix  
 21 proposes that that the Court suspend this case and any decision regarding coordination until the  
 22 resolution of the motion to dismiss.

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1 **IV. Conclusion**

2 For the foregoing reasons, defendant Meetrix respectfully requests that the Court  
3 coordinate this case and the Texas case by having the parties submit a joint status report within ten  
4 (10) days of the Texas court adjudicating the pending Motion to Dismiss.

5  
6 DATE: April 7, 2022

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26 **ATTESTATION OF E-FILER**

27 Pursuant to Local Rule 5-1(i), the undersigned ECF user whose login and password are  
28 being used in filing this document, hereby attests that the signatory has concurred in the filing of  
this document.

Dated: April 7, 2022

29 /s/ W. Paul Schuck  
30 W. Paul Schuck